UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

4/15/96 A.2

APR 15 1996

REPLY TO THE ATTENTION OF:
SR-6J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ronald Frehner
Project Coordinator - ACS NPL Site
Conestoga-Rovers & Associates
1801 Old Highway 8, Suite 114
St. Paul, Minnesota 55112

Re: (Revised) Partial Approval of the Revised Pre-Design Work Plan pertaining to groundwater investigation American Chemical Service, Inc., NPL Superfund Site, Griffith, Indiana

Dear Mr. Frehner:

On September 21, 1995, the United States Environmental Protection Agency (U.S. EPA) partially approved, with modifications, the following Pre-Design Work Plan Sections: 4.1.1 and 4.1.2 pertaining to the Upper Aquifer (UA) Investigation and Lower Aquifer (LA) Investigation; and 3.1 pertaining to the fence installation; the September 21st partial approval was in response to the revised Pre-Design Work Plan dated August 1995 submitted by Montgomery Watson on behalf of Respondents for the American Chemical Service, Inc., National Priorities List (NPL) Superfund Site located in Griffith, Indiana (ACS Site) undergoing Remedial Design/Remedial Action (RD/RA) pursuant to the Unilateral Order (UAO) (Docket No. V-W-95-C-260). [U.S. EPA deferred final comment on the remaining portions of the Work Plan including the quarterly monitoring program.]

The UA and LA investigation process was instituted to get to a meaningful groundwater monitoring program for the quarterly groundwater monitoring requirement established in the Record or Decision and the UAO.

This letter serves to modify the partial approval of the Pre-Design Work Plan for those activities pertaining to the UA and LA investigation and establish a new schedule which will be used for several of the tasks. The modifications outlined in this letter have become necessary because several deviations were noted between those tasks described in the September 21st partial approval letter and the work performed to date at the site.

The modifications to the September 21, 1995, approval letter begin with Task 5, whereas the other tasks will remain unchanged.

Hence the process outlined below shall be incorporated into the Pre-Design Work Plan.

Task 5a requires that Respondents must, within 5 days of Task 4 completion, conduct another water level round, plot groundwater contours in both the UA and LA and provide results to U.S EPA/IDEM. Respondents must also layout field sampling locations for Tracer Study in field and on a map for the UA for EPA/IDEM field approval.

Task 5b requires that Respondents 1) propose to sample the deep on-site production wells; 2) develop a scope of work (SOW) and standard operating procedures (SOPs) for vertical aquifer profiling in the LA; and 3) propose new wells for vertical aquifer profiling and well installation in the LA.

Task 6a requires that after U.S. EPA/IDEM approval, Respondents shall conduct the UA field screening investigation (formerly the Tracer Investigation) in accordance with the approved SOW and SOPs. This task must be completed by March 11, 1996.

Task 6b requires that Respondents shall also perform the following: 1) conduct vertical aquifer profiling and well installation in the LA; 2) install LA wells and sample new wells for full scan analyses in accordance with the U.S. EPA approved SOW and SOPs; the well screen locations are subject to U.S. EPA/IDEM field approval; 3) sample the deep on-site production wells. Task 6b must be completed by March 18, 1996.

By March 18, 1996, the following must be performed by Respondents under Task 7a: Results of the UA field screening investigation shall be submitted to U.S. EPA/IDEM in a technical memorandum for approval along with a table of information and results mapped along with providing data in a computerized format. Along with the technical memorandum, Respondents shall propose new and or existing well locations, for U.S.EPA/IDEM approval, to define nature and extent of contamination. These wells shall be sampled for full scan analyses (i.e., TCL/TAL parameters) in accordance with the U.S. EPA approved QAPP. In addition, Respondents shall update the status of information pertaining to wells used for drinking water purposes (i.e., residential wells) in the area and propose to sample these wells on an expedited basis.

By May 3, 1996, the following must be performed by Respondents under Task 7b: Results of the LA investigation and results of production well sampling shall be submitted to U.S.EPA/IDEM in a technical memorandum, for approval, along with a table of information and results mapped along with providing data in a computerized format. Along with the technical memorandum, Respondents shall propose new and/or existing well locations for U.S.EPA/IDEM approval, to define nature and extent of contamination. These wells shall be sampled for full scan analyses (i.e., TCL/TAL parameters) in accordance with the U.S. EPA approved QAPP.

Within 45 days after U.S. EPA/IDEM approval in Task 7a, pursuant to Task 8a, Respondents shall perform the following as directed by U.S. EPA/IDEM: 1) install additional UA wells and conduct sampling in UA wells for full scan analyses; and 2) collect a round of water level measurements. This task should be targeted for June 1996.

Within 45 days after U.S. EPA/IDEM approval in Task 7b, pursuant to Task 8b, Respondents shall perform the following as directed by U.S. EPA/IDEM: 1) install additional LA wells and conduct sampling in LA wells for full scan analyses; and 2) collect a round of water level measurements. This task shall be targeted for July 1996.

Task 9a requires, within 60 days after Task 8a completion, Respondents shall provide results of the UA sampling event in a technical memorandum including data in computerized format for approval. Along with the technical memorandum, Respondents shall propose a groundwater monitoring detection/compliance network for the upper aquifer wells for the first quarterly sampling round for U.S. EPA/IDEM **formal** approval.

Pursuant to Task 9b, within 60 days after completion of Task 8b, Respondents submit the results of the LA sampling event in a technical memorandum, for approval, along with a table of information and results mapped, along with data in a computerized format. Respondents shall also propose a quarterly groundwater program to U.S.EPA and IDEM **formal** approval.

Under Task 10a, after U.S. EPA approval required by Task 9a, Respondents shall conduct the first quarterly groundwater monitoring event in the upper aquifer. The first quarter sampling event should be targeted for August 1996. The report indicating the results of the first quarterly upper aquifer sampling is due to U.S.EPA/IDEM by October 31, 1996.

Under Task 10b, after U.S. EPA approval required by Task 9b, Respondents shall conduct the first quarterly groundwater monitoring event in the lower aquifer. The first quarterly sampling event should be targeted for October 1996. The report

indicating the results of the first quarterly lower aquifer sampling is due to U.S.EPA/IDEM by December 31, 1996.

To be clear, U.S. EPA/IDEM will make a decision regarding the required groundwater monitoring network for both the UA and LA during Tasks 9a and 9b. [Thereafter, U.S. EPA may require additional wells if it is deemed appropriate and necessary.] Full-scan analyses should be run for the detection/compliance monitoring wells in both the upper and lower aquifers on a quarterly basis. [Note that after the agencies have confidence in the types and extent of contamination, a scaled down monitoring program may be discussed in the future. On the other hand, additional monitoring may be required if deemed necessary.] Enclosed is a flow chart of a schedule generally depicting the above-mentioned process.

Respondents can submit an amended Pre-Design Work Plan which incorporates the modifications indicated herein after your receipt of comments on the remainder of the Work Plan.

Also, as you are aware, adequate notification must be given to the U.S. EPA and the Indiana Department of Environmental Management (IDEM) as to the initiation of remedial design/action field work so that the appropriate oversight personnel may be on-site to observe the activities.

If you have any questions, or require clarification, you may reach me at (312) 886-4745.

Sincerely,

Sheri L. Bianchin

Sheri L. Bianchin,
Remedial Project Manager
Superfund Division
Remedial Response Section #3

Enclosure

ENCLOSURE 2

To: From: Date:

Subject: Proj. No.:

UA

TASK	TASK DESCRIPTION	Completion Date
6A	Complete Tracer Study (UA)	March 11
	7 days	
	Report UA Tracer Results (TM) - propose well locations to define nature and extent - propose residential well sampling	March 18
	EPA approval 45 days	
7	Complete the installation of UA wells, conduct GW sampling and measure water levels	June 15
	60 days	
9A	Report UA Results, including (TM) a GW-monitoring detection/ compliance network for quarterly sampling	Aug 15
	EPA approval 10 days	
10A	PERFORM QUARTERLY SAMPLING IN Aug.	
	Report due by October 31, 1996	

LA

TASK	TASK DESCRIPTION	Completion Date
6B	Complete LA Investigation	March 18
	60 days	
7B	Report LA Field Results - propose wells to define nature and extent of LA	May 3
	EPA approval 45 days	
8B	Complete the installation of LA wells, conduct GW sampling and measure water levels	July 31
9B	Report LA Results, including (TM) a GW monitoring detection/ compliance network for quarterly sampling	Sept 30
	EPA approval 100 days	
10B	PERFORM QUARTERLY SAMPLING IN OCT	
	Report due by December 31, 1996	

cc: Peter Vagt, Montgomery Watson
Joe Adams, Montgomery Watson
Holly Grejda, Project Manager; IDEM, Office of Superfund
Steve Mrkvicka, Black & Veatch Waste Science, Inc.
Rob Lantz, Black & Veatch Waste Science, Inc.
Mike McClary, ORC
Steve Mangion, U.S.EPA-HQ